

FILED
MAR 14 2008
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY *JMS* DEPUTY

NOTICE OF RELATED CASES

substantially the same parties, same questions of law, properties, transactions, or event.

In the first action, the parties involved are the same, with the exception of one of the defendants, and the action involved whether or not SEIU, Local 2028 represented employees at Rady Children's Hospital.

In the second action, the parties involved are the same, with the exception of one of the defendants, the action involves Rady Children's Hospital's responsibility under the parties collective bargaining agreement to arbitrate disputes that arise. It is likely, based on the communication from counsel for Rady Children's Hospital that the hospital continues to assert, like it did in the first action, that Local 2028 no longer exists and the collective bargaining agreement is null and void; and, therefore, the hospital has no obligation to arbitrate any disputes with Local 2028.

It appears likely that there will be an unduly burdensome duplication of labor and expense and/or conflicting results if the cases are conducted before different Judges. This is primarily because both cases involve the substantially the same parties and questions of law.

3. Assignment of the Actions:

Petitioner believes that the assignment of this action to the Honorable Barry T. Moskowitz will conserve judicial resources and promote an efficient determination of the actions.

For the reasons stated above, Petitioner respectfully requests that a related case Order be entered respecting the two cases listed in numbered paragraphs above.

Dated: March 12, 2008

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